# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

Chapter 11

PURDUE PHARMA L.P., et al.,

Case No. 19-23649 (RDD)

Debtors.1

(Jointly Administered)

### MONTHLY FEE STATEMENT OF CORNERSTONE RESEARCH FOR COMPENSATION FOR SERVICES RENDERED AS CONSULTANT TO THE DEBTORS FOR THE PERIOD FROM MAY 1, 2021 THROUGH MAY 31, 2021

Name of Applicant	Cornerstone Research
Applicant's Role in Case	Consultant to Purdue Pharma L.P., et al.,
<b>Date Order of Employment Signed</b>	June 11, 2020
Period for which compensation and reimbursement is sought	May 1, 2021 through May 31, 2021

<b>Summary of Total Fees and Expenses Requested</b>			
Total compensation requested in this statement	\$122,897.20 (80% of \$153,621.50)		
Total reimbursement requested in this statement	\$0.00		
Total compensation and reimbursement requested in this statement	\$122,897.20		

<sup>1 -</sup>

<sup>&</sup>lt;sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

19-23649-shl Doc 3104 Filed 07/01/21 Entered 07/01/21 19:57:57 Main Document Pg 2 of 13

This is a(n): X\_Monthly Application\_\_\_\_Interim Application\_\_\_\_Final Application

Pursuant to sections 327, 330, and 331 of chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York (the "Local Rules"), the Order Authorizing the Retention and Employment of Cornerstone Research as Consultants for the Debtors Nunc Pro Tunc to January 14, 2020 [ECF No. 1255] (the "Retention Order"), and the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals, dated November 21, 2019 [Docket No. 529] (the "Interim Compensation Order"), Cornerstone Research, consultant for the above-captioned debtors and debtors in possession (collectively, the "Debtors"), submits this Monthly Fee Statement of Cornerstone Research for Services Rendered as Consultant to the Debtor for the Period from May 1, 2021 Through May 31, 2021 (this "Fee Statement"). By this Fee Statement, Cornerstone Research seeks compensation in the amount of \$122,897.20 which is equal to 80% of the total amount of reasonable compensation for actual, necessary consulting services that Cornerstone Research incurred in connection with such services during the Fee Period (i.e., \$153,621.50).

<sup>&</sup>lt;sup>2</sup> The period from May 1, 2021 through and including May 31, 2021, is referred to herein as the "Fee Period."

19-23649-shl Doc 3104 Filed 07/01/21 Entered 07/01/21 19:57:57 Main Document Pa 3 of 13

#### **Itemization of Services Rendered and Disbursements Incurred**

- 1. Attached hereto as **Exhibit A** is a chart of the number of hours expended and fees incurred (on an aggregate basis) by Cornerstone Research consultants and litigation support staff during the Fee Period with respect to each project category. As reflected in **Exhibit A**, Cornerstone Research incurred \$153,621.50 in fees during the Fee Period. Pursuant to this Fee Statement, Cornerstone Research seeks reimbursement for 80% of such fees, totaling \$122,897.20.
- Attached hereto as **Exhibit B** is a chart of Cornerstone Research staff, including the standard hourly rate for each consultant and litigation support staff member who rendered services to the Debtors in connection with these chapter 11 cases during the Fee Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each individual. The blended hourly billing rate of consultants for all services provided during the Fee Period is \$589.72.<sup>3</sup>
- 3. Attached hereto as **Exhibit C** are the time records of Cornerstone Research for The Fee Period organized by month and project category with a daily time log describing the time spent by each consultant during Fee Period.

### **Notice**

4. The Debtors will provide notice of this Fee Statement in accordance with the Interim Compensation Order. The Debtors submit that no other or further notice be given.

[Remainder of Page Left Blank Intentionally]

<sup>&</sup>lt;sup>3</sup> The blended hourly billing rate of \$589.72 for consultants is derived by dividing the total fees for consultants of \$153,621.50 by the total hours of 260.50.

19-23649-shl Doc 3104 Filed 07/01/21 Entered 07/01/21 19:57:57 Main Document Pg 4 of 13

WHEREFORE, Cornerstone Research, in connection with services rendered on behalf of

the Debtors, respectfully requests (i) compensation in the amount of \$122,897.20 which is equal

to 80% of the total amount of reasonable compensation for actual, necessary consulting services

that Cornerstone Research incurred in connection with such services during the Fee Period (i.e.,

\$153,621.50).

Dated:

July 1, 2021

Boston, Massachusetts

CORNERSTONE RESEARCH

By: /s/ Sally Woodhouse

699 Boylston Street

Boston, Massachusetts 02116

Telephone: (617) 927-3000

Facsimile: (617) 927-3100

### Exhibit A

# **Fees By Project Category**

Project Category	Total Hours	<b>Total Fees</b>
Preparation of Fee Statements	2.60	\$ 1,729.00
Claims Valuation	257.90	\$ 151,892.50
Total	260.50	\$ 153,621.50

19-23649-shl Doc 3104 Filed 07/01/21 Entered 07/01/21 19:57:57 Main Document Pg 6 of 13

### Exhibit B

### **Professional and Paraprofessional Fees**

		Hourly	<b>Total Hours</b>	
Individual	Title	Rate	Billed	<b>Total Compensation</b>
<b>Professional Fees</b>				
Woodhouse, Sally	Senior Vice President	\$ 875.00	11.10	\$ 9,712.50
Haque, Rezwan	Senior Manager	\$ 665.00	73.70	\$ 49,010.50
Lee, James	Senior Manager	\$ 665.00	11.50	\$ 7,647.50
Abraham, Sarah M.	Manager	\$ 625.00	39.90	\$ 24,937.50
Guo, Fang	Manager	\$ 625.00	47.80	\$ 29,875.00
Yanguas, Maria Lucia	Associate	\$ 560.00	2.90	\$ 1,624.00
Popov, Anton	Associate	\$ 510.00	26.80	\$ 13,668.00
King, Kyla M.	Research Associate	\$ 420.00	11.50	\$ 4,830.00
Delsman, Benjamin P.	Analyst	\$ 355.00	10.30	\$ 3,656.50
Miller, Robert M.	Analyst	\$ 355.00	16.40	\$ 5,822.00
Bazak, Eric R.	Analyst	\$ 330.00	8.60	\$ 2,838.00
		Total	260.50	\$ 153,621.50

## Exhibit C

## Time Detail by Project Category and Month

**Project Category: Preparation of Fee Statements** 

Timekeeper	Date	Hours	Narrative
Haque, Rezwan	5/6/2021	1.2	Reviewed time narratives for monthly
			fee statement.
Lee, James	5/6/2021	0.1	Reviewed April fee statement.
Haque, Rezwan	5/21/2021	0.7	Reviewed monthly fee statement.
Haque, Rezwan	5/25/2021	0.3	Reviewed monthly fee statement.
Haque, Rezwan	5/26/2021	0.1	Corresponded with counsel regarding
			monthly fee statement.
Haque, Rezwan	5/27/2021	0.2	Finalized monthly fee statement.

Total 2.6

**Project Category: Claims Valuation** 

Timekeeper	Date	Hours	Narrative
	5/3/2021	2.0	Outlined potential expert report for
Abraham, Sarah M.	3/3/2021	2.0	personal injury claims analyses.
	5/3/2021	0.8	Reviewed draft expert report outline for
Lee, James	3/3/2021	0.8	personal injury claims valuations.
	5/4/2021	0.6	Assisted with potential personal injury
Abraham, Sarah M.	3/4/2021	0.0	claims expert report outline.
	5/4/2021	0.4	Reviewed draft expert report for
Lee, James	3/4/2021	0.4	personal injury claimants.
	5/4/2021	0.5	Reviewed draft personal injury report
Yanguas, Maria Lucia	3/4/2021	0.5	outline.
	5/5/2021	0.3	Assisted with potential personal injury
Abraham, Sarah M.	3/3/2021	0.5	claims expert report outline.
	5/5/2021	0.5	Reviewed draft expert report regarding
Lee, James	3/3/2021	0.5	personal injury claims data valuation.

	5/5/2021	0.2	Reviewed outline of potential topics to
Woodhouse, Sally	3/3/2021	0.2	cover in personal injury focused expert report.
Woodnouse, Sany			Shared potential outline for personal
Abraham, Sarah M.	5/6/2021	0.6	injury expert report with counsel.
	7 /T /2 0 2 1	0.5	Reviewed trust distribution procedures
Abraham, Sarah M.	5/7/2021	0.7	for multiple claimant groups.
	5/7/2021	0.7	Call with counsel regarding claims
Abraham, Sarah M.			valuation.
Abraham, Sarah M.	5/7/2021	0.9	Discussed claims valuation with team.
Guo, Fang	5/7/2021	0.7	Call with counsel regarding affirmative report.
, 0	5/7/2021	0.9	Discussed claims valuation analyses
Guo, Fang	5/1/2021	0.9	with team.
Guo, Fang	5/7/2021	2.7	Reviewed trust distribution procedures.
Haque, Rezwan	5/7/2021	0.4	Reviewed trust distribution procedures.
	5/7/2021	0.7	Call with counsel to discuss hospital
Haque, Rezwan	3/1/2021	0.7	claims valuation.
II D	5/7/2021	0.9	Discussed claims valuation analyses
Haque, Rezwan			with team.  Reviewed and summarized supplement
	5/7/2021	4.0	to state and municipal claims allocation
King, Kyla M.	3/ // 2021	7.0	document.
	5/7/2021	0.2	Reviewed documents received from
Lee, James	5/7/2021	0.2	counsel.
	5/7/2021	0.5	Planned next steps for team regarding
Lee, James	3/ // 2021	0.5	claims valuation.
, , ,	5/7/2021	0.7	Call with counsel to discuss personal
Lee, James			injury claims valuation.
Lee, James	5/7/2021	0.9	Discussed claims valuation analyses with team.
Lee, James			Discussed claims valuation analyses
Popov, Anton	5/7/2021	0.9	with team.
	5/7/2021	0.7	Phone call with counsel regarding
Woodhouse, Sally	5/7/2021	0.7	potential affirmative reports.
	5/7/2021	0.9	Discussed claims valuation analyses
Woodhouse, Sally	3/ // 2021	0.7	with team.
	5/7/2021	0.9	Discussed claims valuation analyses
Yanguas, Maria Lucia			with team.
Haque, Rezwan	5/10/2021	1.2	Reviewed hospital trust distribution procedures.
riaque, Nezwan			Reviewed supplement to state and
King, Kyla M.	5/10/2021	2.5	municipal claims allocation document.
King, Kyla M.	5/10/2021	2.7	Prepared summary of claims allocation.
<i>U, y</i>			Reviewed hospital trust distribution
Popov, Anton	5/10/2021	0.9	procedures.
Bazak, Eric R.	5/11/2021	0.6	Reviewed claims valuation analyses.

		1	T
Haque, Rezwan	5/11/2021	0.7	Reviewed hospital trust distribution procedures.
Popov, Anton	5/11/2021	0.6	Reviewed hospital trust distribution procedures.
Bazak, Eric R.	5/12/2021	1.3	Reviewed potential data sources for expert report.
Guo, Fang	5/12/2021	1.8	Prepared summary of trust distribution procedures.
Haque, Rezwan	5/12/2021	0.8	Reviewed hospital claims valuation analyses.
Haque, Rezwan	5/12/2021	1.3	Reviewed and summarized hospital trust distribution procedures.
King, Kyla M.	5/12/2021	1.9	Reviewed and summarized supplement to state and municipal claims allocation document.
Abraham, Sarah M.	5/13/2021	3.5	Reviewed trust distribution procedures for third-party payor and personal injury claimants.
Bazak, Eric R.	5/13/2021	3.6	Reviewed potential data sources for expert report.
Guo, Fang	5/13/2021	2.4	Reviewed trust distribution procedures for public entities.
Haque, Rezwan	5/13/2021	1.8	Planned analysis of hospital trust distribution procedures.
Lee, James	5/13/2021	1.0	Reviewed claims valuation analyses.
Lee, James	5/13/2021	1.9	Reviewed and edited summary of trust distribution procedures.
Woodhouse, Sally	5/13/2021	1.2	Reviewed proposed trust distribution procedures for different claimant groups.
Abraham, Sarah M.	5/14/2021	0.7	Communicated case updates to team.
Abraham, Sarah M.	5/14/2021	0.9	Call with counsel regarding scope of expert reports.
Guo, Fang	5/14/2021	0.7	Discussed claims valuation analyses with team.
Guo, Fang	5/14/2021	0.9	Call with counsel to discuss affirmative expert report.
Guo, Fang	5/14/2021	1.2	Reviewed previous expert reports for abatement cost analysis.
Haque, Rezwan	5/14/2021	0.3	Coordinated follow up research.
Haque, Rezwan	5/14/2021	0.5	Discussed claims valuation analyses with team.
Haque, Rezwan	5/14/2021	0.9	Call with counsel to discuss claims valuation estimates.
Lee, James	5/14/2021	0.9	Attended call with counsel to discuss claims valuation estimates.

Lee, James	5/14/2021	1.2	Prepared materials for call with counsel regarding claims valuation estimates.
Popov, Anton	5/14/2021	0.7	Discussed claims valuation analyses with team.
Woodhouse, Sally	5/14/2021	0.5	Discussed affirmative report with team members.
Woodhouse, Sally	5/14/2021	0.9	Phone call with counsel to discuss affirmative report.
Yanguas, Maria Lucia	5/14/2021	0.5	Discussed claims valuation analyses with team.
Guo, Fang	5/17/2021	2.7	Worked on draft report outline.
Haque, Rezwan	5/17/2021	1.2	Assisted expert with draft outline.
Popov, Anton	5/17/2021	0.7	Reviewed literature on abatement programs.
Delsman, Benjamin P.	5/18/2021	2.2	Reviewed literature on public health spending.
Guo, Fang	5/18/2021	0.4	Call with expert to discuss affirmative report.
Guo, Fang	5/18/2021	2.4	Worked on draft expert report outline.
Guo, Fang	3/16/2021	2.4	Call with expert to discuss trust
Haque, Rezwan	5/18/2021	0.4	distribution procedures.
Haque, Rezwan	5/18/2021	3.3	Reviewed academic literature on public health programs.
Miller, Robert M.	5/18/2021	1.1	Conducted academic literature review.
Popov, Anton	5/18/2021	1.0	Prepared summary of academic literature.
Popov, Anton	5/18/2021	3.5	Compiled literature on abatement programs.
Woodhouse, Sally	5/18/2021	0.4	Phone call with expert to discuss affirmative report.
Delsman, Benjamin P.	5/19/2021	0.9	Reviewed academic literature on opioid abatement policies.
Haque, Rezwan	5/19/2021	2.4	Reviewed academic literature on opioid abatement programs.
Miller, Robert M.	5/19/2021	3.3	Conducted academic literature review.
Abraham, Sarah M.	5/20/2021	0.5	Reviewed academic literature.
Guo, Fang	5/20/2021	4.0	Worked on draft expert report.
Guo, Fang	5/20/2021	4.0	Reviewed literature on public finance.
Haque, Rezwan	5/20/2021	2.2	Reviewed academic literature on public health programs.
Haque, Rezwan	5/20/2021	2.8	Assisted expert with draft outline.
Miller, Robert M.	5/20/2021	1.5	Reviewed academic literature sources.
Miller, Robert M.	5/20/2021	3.7	Conducted academic literature search.
Popov, Anton	5/20/2021	2.0	Prepared summary of academic literature.

	7/00/0001		Compiled literature on opioid abatement
Popov, Anton	5/20/2021	3.7	programs.
Abraham, Sarah M.	5/21/2021	0.5	Discussed analyses for expert report with team.
Abraham, Sarah M.	5/21/2021	0.8	Discussed key points of expert report with counsel.
Bazak, Eric R.	5/21/2021	0.2	Worked on analysis of state allocation percentages.
Guo, Fang	5/21/2021	0.5	Discussed claims valuation analysis with team.
Guo, Fang	5/21/2021	0.5	Worked on draft outline.
Guo, Fang	5/21/2021	0.8	Call with counsel regarding affirmative expert report.
Guo, Fang	5/21/2021	1.6	Worked on draft expert report.
Haque, Rezwan	5/21/2021	0.5	Discussed trust distribution analyses with team.
Haque, Rezwan	5/21/2021	0.8	Call with counsel to discuss trust distribution analyses.
Haque, Rezwan	5/21/2021	1.2	Reviewed economic literature on provision of public goods.
Haque, Rezwan	5/21/2021	2.7	Assisted expert with draft outline.
King, Kyla M.	5/21/2021	0.4	Analyzed states' consolidated claims form.
Lee, James	5/21/2021	0.5	Discussed next steps with team regarding draft expert report.
Lee, James	5/21/2021	0.8	Call with counsel to discuss draft expert report.
Miller, Robert M.	5/21/2021	0.3	Reviewed claims distribution under different schedules.
Popov, Anton	5/21/2021	0.5	Discussed analyses for expert report with team.
Popov, Anton	5/21/2021	1.1	Assisted expert with draft report.
Woodhouse, Sally	5/21/2021	0.3	Discussed report with team.
Woodhouse, Sally	5/21/2021	0.7	Phone call with counsel regarding expert report.
Yanguas, Maria Lucia	5/21/2021	0.5	Discussed claims valuation analyses with team.
Guo, Fang	5/22/2021	2.6	Worked on draft expert report.
Woodhouse, Sally	5/22/2021	0.6	Reviewed draft expert report outline.
Abraham, Sarah M.	5/23/2021	3.5	Reviewed draft report.
Abraham, Sarah M.	5/23/2021	4.0	Aided expert with draft report.
Haque, Rezwan	5/23/2021	3.8	Assisted expert with draft outline.
Popov, Anton	5/23/2021	0.3	Assisted expert with draft t report.
Abraham, Sarah M.	5/24/2021	1.0	Discussed report with expert.
Bazak, Eric R.	5/24/2021	2.9	Worked on analysis of state allocation percentages.

Guo, Fang	5/24/2021	0.7	Call with expert to discuss analyses for expert report.
Guo, Fang	5/24/2021	2.1	Worked on draft report.
Guo, Fang	5/24/2021	2.4	Reviewed state allocation based on claims valuation.
Haque, Rezwan	5/24/2021	0.7	Call with expert to discuss draft report.
Haque, Rezwan	5/24/2021	2.5	Reviewed prior expert reports.
Haque, Rezwan	5/24/2021	2.8	Reviewed academic literature.
Haque, Rezwan	5/24/2021	3.1	Assisted expert with draft outline.
Miller, Robert M.	5/24/2021	1.9	Reviewed state allocation percentages.
Popov, Anton	5/24/2021	1.0	Assisted expert with draft report.
Woodhouse, Sally	5/24/2021	0.7	Phone call with expert to discuss expert report.
Abraham, Sarah M.	5/25/2021	2.8	Reviewed draft report.
Abraham, Sarah M.	5/25/2021	4.0	Aided expert with draft report.
Delsman, Benjamin P.	5/25/2021	2.6	Summarized literature on opioid abatement programs.
Guo, Fang	5/25/2021	2.2	Worked on draft report.
Haque, Rezwan	5/25/2021	1.8	Reviewed prior expert reports.
Haque, Rezwan	5/25/2021	3.1	Reviewed academic literature.
Haque, Rezwan	5/25/2021	3.8	Assisted expert with draft report.
Miller, Robert M.	5/25/2021	1.1	Assisted expert with draft report.
Miller, Robert M.	5/25/2021	2.6	Conducted academic research for expert report.
Popov, Anton	5/25/2021	0.3	Assisted expert with draft report.
Abraham, Sarah M.	5/26/2021	1.8	Reviewed draft report.
Abraham, Sarah M.	5/26/2021	3.8	Aided expert with draft report.
Delsman, Benjamin P.	5/26/2021	2.0	Reviewed academic literature.
Delsman, Benjamin P.	5/26/2021	2.6	Researched and summarized academic literature on opioid abatement programs
Guo, Fang	5/26/2021	4.1	Worked on draft report.
Haque, Rezwan	5/26/2021	1.2	Reviewed trust distribution procedures.
Haque, Rezwan	5/26/2021	2.3	Reviewed academic literature.
Haque, Rezwan	5/26/2021	2.5	Reviewed draft outline.
Haque, Rezwan	5/26/2021	3.9	Assisted expert with draft report.
Miller, Robert M.	5/26/2021	0.9	Assisted expert with draft report.
Popov, Anton	5/26/2021	1.0	Reviewed academic literature.
Popov, Anton	5/26/2021	3.1	Assisted expert with draft report.
Woodhouse, Sally	5/26/2021	2.0	Reviewed draft expert report.
Abraham, Sarah M.	5/27/2021	1.0	Call with expert regarding draft report.
Abraham, Sarah M.	5/27/2021	3.0	Aided expert with draft report.
Guo, Fang	5/27/2021	1.0	Call with expert to discuss affirmative expert report.
Guo, Fang	5/27/2021	2.3	Worked on draft expert report.

Haque, Rezwan	5/27/2021	0.6	Reviewed academic literature.
Haque, Rezwan	5/27/2021	0.8	Reviewed data on opioid abatement funding.
Haque, Rezwan	5/27/2021	1.0	Call with expert to discuss draft report.
Haque, Rezwan	5/27/2021	1.8	Reviewed draft report.
Haque, Rezwan	5/27/2021	2.7	Assisted expert with draft report.
Popov, Anton	5/27/2021	2.1	Assisted expert with draft report.
Woodhouse, Sally	5/27/2021	1.0	Phone call with expert to discuss draft report.
Abraham, Sarah M.	5/28/2021	0.5	Discussed analyses for expert report with team.
Abraham, Sarah M.	5/28/2021	0.6	Call with counsel regarding expert report.
Abraham, Sarah M.	5/28/2021	1.2	Aided expert with draft report.
Guo, Fang	5/28/2021	0.6	Call with counsel regarding affirmative report.
Guo, Fang	5/28/2021	1.6	Worked on draft expert report.
Haque, Rezwan	5/28/2021	0.5	Discussed analyses for expert report with team.
Haque, Rezwan	5/28/2021	0.6	Call with counsel to discuss expert report.
Haque, Rezwan	5/28/2021	1.2	Reviewed report outline to prepare for call with counsel.
Haque, Rezwan	5/28/2021	1.3	Reviewed public data on opioid abatement funding.
Haque, Rezwan	5/28/2021	2.2	Assisted expert with draft report.
Lee, James	5/28/2021	0.5	Discussed next steps with team regarding draft expert report.
Lee, James	5/28/2021	0.6	Call with counsel regarding draft expert report.
Popov, Anton	5/28/2021	0.5	Discussed analyses for expert report with team.
Popov, Anton	5/28/2021	2.9	Searched for literature and data on opioid abatement funding.
Woodhouse, Sally	5/28/2021	0.4	Discussed expert report with team.
Woodhouse, Sally	5/28/2021	0.6	Phone call with counsel to discuss expert report.
Yanguas, Maria Lucia	5/28/2021	0.5	Discussed analyses for expert report with team.

Total257.9Grand Total260.5